



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

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June 1, 2007

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Tahoe Regional Planning Agency
P.O. Box 5310
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Subject: Draft Environmental Impact Statement for Vista Village Workforce
Housing Project, Placer County, CA (CEQ# 20070208)

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The need for affordable housing in the north Lake Tahoe area has been documented by the Tahoe Regional Planning Agency (TRPA) and Placer County (DEIS Chapter 3). EPA supports projects that are town-centered, transit- and pedestrian-oriented, preserves open space and environmental resources, and has a greater mix of housing, commercial, and retail uses. We commend the effort to provide professionally managed affordable housing to local workers and their families which will reduce long-distance commutes, traffic congestion, and air quality impacts.

Based on our review, we have rated the Draft Environmental Impact Statement (DEIS) as Environmental Concerns – Adequate (EC-1) (see enclosed "*Summary of Rating Definitions*"). While we support the project concept, the Lake Tahoe Basin is non-attainment for the California air quality standard for particulate matter 10 microns or less in diameter (PM₁₀) and is above the TRPA significance thresholds for ozone, visibility, vehicle miles traveled (VMT), water quality, and wood smoke (p. 5.6-12). We are concerned additional development, especially when combined with other identified local projects (Table 5.12-1, pps. 5.12-3 to 5.12-8), will exacerbate these conditions.

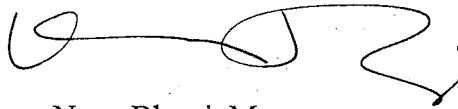
To minimize adverse environmental effects of the new development we encourage implementation of the environmentally superior alternative, Alternative D – 72 Units (p. 6-4). This alternative would provide affordable housing without exceeding the allowable 30% ground coverage for this land capability category and would be consistent with Regional Plan and TRPA land use goals and policies (p. 1-27). This alternative

would also provide a transition zone between the higher density Tahoe Vista Community Plan and lower density Tahoe Estates subdivision (p. 5.3-20).

Regardless of the selected alternative, we recommend the project utilize the Leadership in Energy and Environmental Design (LEED) standard for green building. LEED emphasizes state of the art strategies for sustainable site development, water savings, energy efficiency, materials selection, and indoor air quality. More information about the LEED green building rating system is available at <http://www.usgbc.org/DisplayPage.aspx?CategoryID=19&>. For questions on green building, please contact Timonie Hood with EPA Region 9's Solid Waste Office at 415-972-3282.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send one (1) hard copy to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3846 or Laura Fujii, the lead reviewer for this project. Laura can be reached at (415) 972-3852 or fujii.laura@epa.gov.

Sincerely,



Nova Blazej, Manager
Environmental Review Office

Enclosure:
Summary of EPA Rating Definitions

cc: Bill Combs, Placer County Planning Department
Jacques Landy, Lake Tahoe Basin Coordinator, Region 9 EPA

SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."